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9 Attorney for Plaintiff,
10 MICHEL KECK

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UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON

11 MICHEL KECK, an individual,
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13 Plaintiff,

13 v.

14 LITB INC. d/b/a www.lightinthebox.com, a
15 Washington corporation; and, DOES 1
16 through 50 inclusive,

16 Defendants.

Case No. 2:17-cv-01671-JLR

MOTION AND ~~PROPOSED~~
ORDER TO EXTEND TIME TO
FILE ANSWER OR OTHER
RESPONSIVE MOTION

1 WHEREAS, Plaintiff Michel Keck ("Plaintiff") filed her complaint on
2 November 7, 2017 naming as defendants LITB INC. d/b/a www.lightinthebox.com
3 and DOES 1 through 50 (collectively "Defendants") (Dkt. #1);

4 WHEREAS, pursuant to Defendants' timely waiver of service, the time for
5 Defendants to answer or otherwise move in response to the complaint is January
6 26, 2018;

7 WHEREAS, counsel for Plaintiff has been in communication with counsel
8 for Defendants to discuss settlement and the parties have agreed to extend the time
9 for Defendants to answer or otherwise respond to the complaint for two additional
10 weeks in light of these discussions;

11 NOW, THEREFORE, pursuant to the parties' agreement, Plaintiff
12 respectfully moves the Court to extend the time for the Defendants to answer or
13 otherwise move in response to the complaint to February 9, 2018.

14
15 DATED: January 23, 2017

HIGBEE & ASSOCIATES

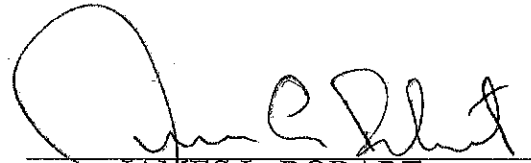
16 By: /s/ Mathew K. Higbee

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18 Mathew K. Higbee, Esq.,
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~~PROPOSED~~ ORDER

IT IS SO ORDERED that the deadline for the Defendants to answer or otherwise move in response to Plaintiff's complaint shall be February 9, 2018.

DATED: 4 February, 2018


JAMES L. ROBERT
DISTRICT JUDGE

PROOF OF SERVICE

I am employed in the County of Orange, State of California; I am over the age of 18 and not a party to the within action; my business address is 1504 Brookhollow Dr., Ste 112, Santa Ana, California, 92705

On January 23, 2018, I served the foregoing document(s) described as:

**MOTION AND [PROPOSED] ORDER TO EXTEND TIME TO FILE
ANSWER OR OTHER RESPONSIVE MOTION**

X (BY EMAIL) I caused such documents to be delivered via electronic mail to the email addresses for counsel as follows:

Harrison "Buzz" Frahn <hfrahn@stblaw.com>

Michael H. Joshi <Michael.Joshi@stblaw.com>

Counsel for Defendant LITB Inc.

(BY MAIL) I deposited such envelope in the mail at Santa Ana, California. The envelope was mailed with postage thereon fully prepaid and addressed to the person below:

(BY PERSONAL SERVICE) by causing a true and correct copy of the above documents to be hand delivered in sealed envelope(s) with all fees fully paid, to the person(s) at the address(es) set forth below:

(BY EXPRESS MAIL) I deposited such envelope on the parties in said action via FEDEX STANDARD OVERNIGHT by placing a copy in a sealed envelope, postage pre-paid and depositing in a FedEx box at Santa Ana, California to the person(s) below:

I certify under penalty of perjury under the laws of the United States that the foregoing is true and correct. Executed on January 23, 2018, at Santa Ana, California.

/s/ Ryan E. Carreon

Ryan E. Carreon